

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Max W. Gavron (State Bar No. 291697)
mgavron@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071
Tel: (213) 488-6555
Fax: (213) 488-6554

William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
Tel: (831) 531-4214
Fax: (831) 634-0333

Attorneys for Plaintiff, the Class, and Aggrieved Employees

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TERRANCE LOVETT, as an individual and
on behalf of all others similarly situated,
ROBERT PARSONS, as an individual and on
behalf of all others similarly situated,
JAVIER CUEVAS MAGANA, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

ESTENSON LOGISTICS, LLC, a Delaware
limited liability company; HUB GROUP
TRUCKING, INC., a Delaware corporation,
and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:20-cv-02403-KJM-CKD

**STIPULATION TO TRANSFER CASE
TO THE CENTRAL DISTRICT OF
CALIFORNIA WHERE RELATED
CASES ARE PENDING; ORDER**

1 Plaintiffs Terrance Lovett, Robert Parsons, and Javier Cuevas Magana (“Plaintiffs”) and
2 Defendants Estenson Logistics, LLC & HUB Group Trucking, Inc. (“Defendants”) (collectively,
3 the “Parties”) hereby jointly submit this Stipulation to request this Court to transfer this action to
4 the United States District Court for the Central District of California.

5 As previously reported to the Court, there are several cases pending in the Central District of
6 California before Judge Kronstadt against Defendants. (*See* Dkt. Nos. 16-1, Ex. A (docket report
7 for *Raul Martinez v. Hub Group Trucking, Inc.*, United States District Court, Central District, Case
8 No. 5:20-cv-01384-JAK-SP); *see also* *Martinez v. Hub Group Trucking, Inc.*, United States District
9 Court, Central District Case No. 5:20-cv-01384-JAK-SAP).

10 On February 8, 2021, Judge Kronstadt held a conference wherein he permitted the plaintiffs
11 in two of the pending actions until March 31, 2021 to meet and confer and file a consolidated
12 complaint that would include the addition of the plaintiffs and claims currently pending before the
13 Court in this action. After the conference, Plaintiffs met and conferred with the plaintiffs in the
14 related actions and plan to file an amended, consolidated complaint, provided that the Court permits
15 the transfer of this action to the Central District.

16 In light of the foregoing, the Parties request that the Court transfer this action to the Central
17 District of California so that Plaintiffs may file a consolidated complaint with the actions pending
18 before Judge Kronstadt.

19 Section 1404 of Title 28 of the United States Code provides: “For the convenience of the
20 parties, in the interest of justice, a district court may transfer any civil action to any other district or
21 division where it might have been brought or to any district or division to which all parties have
22 consented.” Accordingly, the Parties request that the Court transfer this action to the Central
23 District of California to be litigated in conjunction with the other cases pending against Defendants,
24 which will serve the interests of justice and judicial efficiency.

1 DATED: February 18, 2021

DIVERSITY LAW GROUP, P.C.

2 By: /s/ Max Gavron

3 Larry W. Lee

Max Gavron

4 Attorneys for Plaintiffs, the Class, and
Aggrieved Employees

5 DATED: February 18, 2021

OGLETREE, DEAKINS, NASH, SMOAK, &
6 STEWART, P.C.

7 By: /s/ Michael Nader

8 Michael Nader

Kyle A. Wende

9 Attorneys for Defendants

ORDER

Having considered the parties' Stipulation to Transfer Case to the Central District of California Where Related Cases Are Pending and finding that the transfer of this action to the United States District Court for the Central District of California would serve the interests of justice, the Court TRANSFERS this action to Judge John A. Kronstadt. 28 U.S.C. § 1404.

DATE: February 18, 2021.


CHIEF UNITED STATES DISTRICT JUDGE